

1 **REMARKS**

2 Claims 1, 3, 11 and 19 are amended. Claims 1-26 remain in the
3 application. In view of the following remarks, Applicant respectfully requests
4 withdrawal of the rejections and forwarding of the application on to issuance.
5

6 **Specification Objection**

7 Applicant has amended the Specification to update the cross references to
8 related applications.

9 The Office has objected to the Abstract section insofar as it is not written in
10 narrative form. Applicant has amended the Abstract section to comply with the
11 Office's requirements.
12

13 **Claim Objections**

14 Claims 2-10, 12-18 and 20-26 are objected to because of the informalities
15 listed by the Office on page 2 of the present Office Action. Specifically, the
16 Office states that the dependent claims should start with the word "the", rather
17 than "a".

18 Applicant has reviewed the claims and respectfully submits that there is
19 nothing inappropriate with regards to the form of the claim. The Office appears to
20 agree with this position insofar as a quick search of the PTO database uncovered a
21 number of issued patents that have claims written in a similar form. For example,
22 U.S. Patent No. 6,243,468 includes claims 10-13 as follows:
23

24 10. A software product implemented on a computer readable
25 medium, the software product having a corresponding original registration

1 ID that represents the software product being registered to run on a specific
2 computer having a set of hardware components, comprising:

3 a code segment to obtain a product ID associated with the software
4 product;

5 a code segment to generate a hardware ID that identifies the set of
6 hardware components within the specific computer;

7 a code segment to compute a test ID from the product ID and
8 hardware ID;

9 a code segment to compare the test ID to the original registration ID;

10 a code segment to enable the software product to operate on the
11 specific computer if the test and original registration IDs match; and

12 a code segment to determine if the set of hardware components is
13 substantially different since the registration ID was computed if the test and
14 original registration IDs do not match.

15 11. A software product as recited in claim 10, wherein the code
16 segment to generate a hardware ID derives a multi-bit hardware ID having
17 multiple bits representing corresponding hardware components.

18 12. A software product as recited in claim 10, wherein the code
19 segment to generate a hardware ID derives a five-bit hardware ID that
20 identifies a set of five hardware components within the computer, the five-
21 bit hardware ID having one bit representing each of the five hardware
22 components.

23 13. A software product as recited in claim 10, wherein the code
24 segment to compute the test ID hashes a concatenation of the product ID
25 and hardware ID to produce the test ID.

Additionally, U.S. Patent No. 5,907,685 includes claims 1-4 as follows:

1. In a distributed computer system having a plurality of computer
nodes arranged logically adjacent to each other in a communications ring so
that each computer node receives communications from a preceding
computer node and sends communications to a succeeding computer node,
wherein the computer nodes maintain local clocks with local time values
(c); a method of synchronizing the local clocks, the method comprising the
following steps:

measuring an approximate local offset (d) of the local time value (c)
of each computer node relative to the local time value (c) of the logically
adjacent computer node in the communications ring;

1 passing a plurality of collation variables from a lead one of the
2 computer nodes, through the computer nodes forming the communications
3 ring, and back to the lead computer node in a single pass;

4 distributively processing the collation variables at each computer
5 node as they are passed around the communications ring, said processing
6 being based at least in part on the measured approximate local offsets (d) at
7 each computer node;

8 calculating a difference (m) at the lead computer node between the
9 local time value (c) of the lead computer node and a mean of the local time
10 values (c) of at least some of the computer nodes based upon the collation
11 variables received back at the lead computer node after being passed around
12 the communications ring;

13 adjusting the local clocks of at least some of the computer nodes as a
14 function of the calculated difference (m).

15 2. A method as recited in claim 1 and further comprising:
16 periodically repeating the steps of claim 1;
17 designating a new lead computer node for each periodic repetition of
18 said steps of claim 1.

19 3. A method as recited in claim 1 and further comprising an
20 additional step of initializing the collation variables to zero before passing
21 them from the lead computer node.

22 4. A method as recited in claim 1, the measuring step comprising:
23 exchanging messages between logically adjacent computer nodes,
24 said messages containing their transmission times;
25 recording the reception times of the messages;
calculating the approximate local offsets (d) from the transmission
and reception times of the messages exchanged between the logically
adjacent computer nodes.

As noted, each of these independent claims includes dependent claims that
start with the indefinite article "a", rather than the definite article "the".
Accordingly, the Office appears to have accepted this stylistic practice, otherwise
these claims would have been required to be rewritten, as the Office now urges the
Applicant to do.

1 In view of the above discussion, Applicant respectfully declines to make
2 the changes required by the Office.

3
4 **§112 Rejections**

5 Claims 1-26 stand rejected under 35 U.S.C. § 112, second paragraph as
6 lacking antecedent basis for certain claim terminology. Applicant has amended
7 the claims referenced by the Office to address this issue. Specifically, claims 1, 3,
8 11 and 19 have been amended to address the Office's rejection, which is now
9 traversed.

10
11 **§103(a) Rejections**

12 Claims 1-26 stand rejected under 35 U.S.C. §103(a) as being obvious over
13 U.S. Patent No. 5,162,904 to Beaulier et al. (hereinafter "Beaulier") in view of
14 U.S. Patent No. 4,220,823 to Littlefield.

15 Preliminarily, before discussing the substance of the Office's rejections, a
16 discussion of Applicant's disclosure is provided in an attempt to help the Office
17 appreciate the distinctions between Applicant's claimed embodiments, and the
18 cited references.

19
20 **Applicant's Disclosure**

21 Among the embodiments described in Applicant's disclosure, one
22 embodiment concerns a system and related methods for reducing memory
23 requirements of a media processing system. In accordance with at least one
24 embodiment, a method of generating a development project including at least a
25 matrix switch and one or more adjacent objects is presented comprising

1 establishing an initial rendering of the development project, and negotiating buffer
2 size and attributes between an input/output coupling the matrix switch to an
3 input/output of the adjacent objects. The negotiated buffer is utilized to
4 communicate information between the input/output of the matrix switch and the
5 input/output of the adjacent object by sharing information via the shared buffer.

6 Consider first Fig. 6 and the related discussion below. Fig. 6 graphically
7 illustrates an example filter graph implementation incorporating an innovative
8 matrix switch 308. In accordance with the illustrated example embodiment, filter
9 graph 600 is generated by render engine 222 in response to a user defined
10 development project. Unlike the lengthy linear filter graphs typical of convention
11 development systems however, filter graph 600 is shown incorporating a matrix
12 switch filter 308 to recursively route the pre-processed content (e.g., through
13 filters 602, 606, 610, 614 and 618, described more fully below) through a user-
14 defined number of transform filters including, for example, transition filter(s) 620
15 and effects filter(s) 622.

16 Fig. 6 is depicted comprising pre-processing filters with a parser filter 606
17 to separate, independent content type(s) (e.g., audio content and video content),
18 wherein one of the media types would be processed along a different path
19 including a separate instance of matrix switch 308. Thus, in accordance with the
20 illustrated example embodiment of a media processing system, processing
21 multimedia content including audio and video would utilize two (2) matrix switch
22 filters 308, one dedicated to audio processing (not shown) and one dedicated to
23 video processing.

24 In addition filter graph 600 includes a decoder filter 610 to decode the
25 media content. Resize filter 614 is employed when matrix switch 308 is to receive

1 content from multiple sources, ensuring that the size of the received content is the
2 same, regardless of the source. According to one implementation, resize filter 614
3 is selectively employed in video processing paths to adjust the media size of
4 content from one or more sources to a user-defined level. Alternatively, resizer
5 filter 614 adjusts the media size to the largest size provided by any one or more
6 media sources. That is, if, for example, render engine 222 identifies the largest
7 required media size (e.g., 1270x1040 video pixels per frame) and, for any content
8 source not providing content at this size, the content is modified (e.g., stretched,
9 packed, etc.) to fill this size requirement. The frame rate converter (FRC) and
10 pack filter 618 ensures that video content from the multiple sources is arriving at
11 the same frame rate, e.g., ten (10) frames per second. The FRC also maintains the
12 distinction between source time and project time.

13 In accordance with one aspect of the described embodiment, filter graph
14 600 is depicted utilizing a single, negotiated buffer 604, 608, 612, 616, etc.
15 between adjacent filters. In this regard, render engine 222 reduces the buffer
16 memory requirements in support of a development project.

17 From the point of pre-processing (filters 602, 606, 610, 614, 618), rather
18 than continue a linear filter graph incorporating all of the transition 620 and effect
19 622 filter(s), render engine 222 utilizes a cascade architecture, recursively passing
20 media content through the matrix switch 308 to apply to the transform filter(s)
21 (e.g., 620, 622, etc.) to complete the execution of the development project.

22 Turning to Fig. 7, a flow chart of an example method for generating a filter
23 graph is presented, in accordance with one aspect of the described embodiment.
24 The method 700 begins with block 702 wherein render engine 222 receives an
25 indication to generate a filter graph representing a user-defined development

1 project (e.g., a media editing project). According to one example implementation,
2 the indication is received from an application 224 via COM interface(s) 302.

3 In block 704, render engine 222 facilitates generation of the editing project,
4 identifying the number and type of media sources selected by the user. In block
5 706, based at least in part on the number and/or type of media sources, filter graph
6 manager 222 exposes source, transform and rendering filter(s) to effect a user
7 defined media processing project, while beginning to establish a programming
8 grid 406 for the matrix switch filter 308.

9 In block 708, reflecting user editing instructions, render engine 222
10 completes the programming grid 406 for matrix switch 308, identifying which
11 inputs 402 are to be coupled to which outputs 404 at particular project times.

12 Based, at least in part, on the programming grid 406 render engine 222
13 generates a matrix switch filter 308 with an appropriate number of input 402 and
14 output 404 pins to effect the project, and assembles the filter graph, block 710.

15 In block 712, to reduce the buffer memory requirements for the processing
16 project, the render engine 222 instructs the filters populating the filter graph to
17 (re)negotiate buffer memory requirements between filters. That is, adjacent filters
18 attempt to negotiate a size and attribute standard so that a single buffer can be
19 utilized to couple each an output pin of one filter to an input pin of a downstream
20 filter. An example implementation of the buffer negotiation process of block 712
21 is presented in greater detail with reference to Fig. 8.

22 Turning briefly to Fig. 8, an example method of negotiating buffer
23 requirements between adjacent filters is presented, in accordance with one
24 example implementation. Once the final connection is established to matrix
25 switch 308, matrix switch 308 identifies the maximum buffer requirements for any

1 filter coupled to any of its pins (input 402 and/or output 404), block 802.
2 According to one implementation, the maximum buffer requirements are defined
3 as the lowest common multiple of buffer alignment requirements, and the
4 maximum of all the pre-fix requirements of the filter buffers.

5 In block 804, matrix switch 308 selectively removes one or more existing
6 filter connections to adjacent filters. Matrix switch 308 then reconnects all of its
7 pins to adjacent filters using a common buffer size between each of the pins, block
8 806. In block 808, matrix switch 308 negotiates to be the allocator for all of its
9 pins (402, 404). If the matrix switch 308 cannot, for whatever reason, be the
10 allocator for any of its input pins 402 minimal loss to performance is encountered,
11 as the buffer associated with the input pin will still be compatible with any
12 downstream filter (i.e., coupled to an output pin) and, thus, the buffer can still be
13 passed to the downstream filter without requiring a memory copy operation. If,
14 however, matrix switch 308 cannot be an allocator for one of its output pins 404,
15 media content must then be transferred to at least the downstream filter associated
16 with that output pin using a memory copy operation, block 810.

17 In block 812, once the matrix switch 308 has re-established its connection
18 to adjacent filters, render engine 222 restores the connection in remaining filters
19 using negotiated buffer requirements emanating from the matrix switch filter 308
20 buffer negotiations. Once the connections throughout the filter graph have been
21 reconnected, the process continues with block 714 of Fig. 7.

22 In block 714 (Fig. 7), have re-established the connections between filters,
23 render engine 222 is ready to implement a user's instruction to execute the media
24 processing project.
25

The Rejections

Claim 1 recites a method of generating a development project including at least a matrix switch and one or more adjacent objects, the method comprising:

- establishing an initial rendering of the development project; and
- *negotiating buffer size and attribute characteristics* between an input/output of the matrix switch and an input/output of adjacent objects, wherein negotiated buffers are utilized to communicate media content between the matrix switch and adjacent buffers by sharing a common buffer between inputs and outputs.

In making out the rejection of this claim, the Office argues that its subject matter is rendered obvious over Beaulier in view of Littlefield. Specifically, the Office argues that Beaulier discloses all of the claimed subject matter except for teaching a common buffer. The Office then relies on Littlefield and argues that it teaches a common buffer in column 3, lines 18-32. Based on this, the Office argues its combination based on a motivation of providing for improving capability of the matrix switch implemented in the digital video processing system.

Applicant respectfully disagrees and submits that the Office has not established a *prima facie* case of obviousness for a couple of different reasons.

First, the combination of the references does not supply all of the claim features. Specifically, this claim recites *negotiating buffer size and attribute characteristics*.... The Office cites to Beaulier's column 4, lines 18-32 as disclosing this subject matter. This excerpt simply describes mix effect units and associated FIFO memory units. Beaulier instructs that the FIFO units are variable depth units whose depths can be "changed and controlled". Nothing in this

1 excerpt discloses or otherwise suggests any negotiation of buffer size and attribute
2 characteristics, as recited in the above claim. Accordingly, for at least this reason,
3 this claim is allowable.

4 Second and perhaps more importantly, the Office's stated motivation for
5 making the combination is misplaced and legally inappropriate. Specifically, the
6 Office essentially argues that the motivation to combine the references would be to
7 improve the capability of the matrix switch implementation—in other words, to
8 make the matrix more efficient.

9 To establish a *prima facie* case of obviousness, three basic criteria *must* be
10 met. First, there must be some suggestion or motivation, either in the references
11 themselves or in the knowledge generally available to one of ordinary skill in the
12 art, to modify the reference or to combine reference teachings. *In re Jones*, 958
13 F.2d 347, 21 USPQ2d 1941 (Fed. Cir. 1992); *In re Fine*, 837 F.2d 1071, 5
14 USPQ2d 1596 (Fed. Cir. 1988). Second, there must be a reasonable expectation
15 of success. *In re Merck & Co., Inc.*, 800 F.2d 1091, 231 USPQ 375 (Fed. Cir.
16 1986). Finally, the prior art reference (or references when combined) must teach
17 or suggest all the claim limitations. *In re Royka*, 490 F.2d 981, 180 USPQ 580
18 (CCPA 1974).

19 Hence, when patentability turns on the question of obviousness, the search
20 for and analysis of the prior art includes evidence relevant to the finding of
21 whether there is a teaching, motivation, or suggestion to select and combine the
22 references relied on as evidence of obviousness. See, e.g., *McGinley v. Franklin*
23 *Sports, Inc.*, 262 F.3d 1339, 1351-52, 60 USPQ2d 1001, 1008 (Fed. Cir. 2001)
24 ("the central question is whether there is reason to combine [the] references," a
25 question of fact drawing on the Graham factors).

1 "The factual inquiry whether to combine references must be thorough and
2 searching." *Id.* It must be based on objective evidence of record. This precedent
3 has been reinforced in myriad decisions, and cannot be dispensed with. See, e.g.,
4 *Brown & Williamson Tobacco Corp. v. Philip Morris Inc.*, 229 F.3d 1120, 1124-
5 25, 56 USPQ2d 1456, 1459 (Fed. Cir. 2000) ("a showing of a suggestion,
6 teaching, or motivation to combine the prior art references is an 'essential
7 component of an obviousness holding") (quoting *C.R. Bard, Inc., v. M3 Systems,*
8 *Inc.*, 157 F.3d 1340, 1352, 48 USPQ2d 1225, 1232 (Fed. Cir. 1998)); *In re*
9 *Dembiczak*, 175 F.3d 994, 999, 50 USPQ2d 1614, 1617 (Fed. Cir. 1999) ("Our
10 case law makes clear that the best defense against the subtle but powerful
11 attraction of a hindsight-based obviousness analysis is rigorous application of the
12 requirement for a showing of the teaching or motivation to combine prior art
13 references."); *In re Dance*, 160 F.3d 1339, 1343, 48 USPQ2d 1635, 1637 (Fed.
14 Cir. 1998) (there must be some motivation, suggestion, or teaching of the
15 desirability of making the specific combination that was made by the applicant); *In*
16 *re Fine*, 837 F.2d 1071, 1075, 5 USPQ2d 1596, 1600 (Fed. Cir. 1988) ("teachings
17 of references can be combined only if there is some suggestion or incentive to do
18 so.") (emphasis in original) (quoting *ACS Hosp. Sys., Inc. v. Montefiore Hosp.*,
19 732 F.2d 1572, 1577, 221 USPQ 929, 933 (Fed. Cir. 1984)).

20 The need for *specificity* pervades this authority. See, e.g., *In re Kotzab*, 217
21 F.3d 1365, 1371, 55 USPQ2d 1313, 1317 (Fed. Cir. 2000) ("*particular findings*
22 must be made as to the reason the skilled artisan, with no knowledge of the
23 claimed invention, would have selected these components for combination in the
24 manner claimed") (emphasis added).

1 Applicant respectfully submits that the Office's stated motivation – to
2 provide an improved matrix switch – is lacking in the specificity and particularity
3 that is required by law.

4 Additionally, and of particular interest in this case, is a reference article
5 published by the Office and available at:

6
7 <http://www.uspto.gov/web/menu/busmeth103rej.htm>.

8
9 This article provides examples of legally appropriate and legally
10 inappropriate rejections under § 103. Particularly instructive, in the present
11 situation, is Example 17 which is reproduced in its entirety below:

12
13 Example 17: Improper rejection based upon hindsight - general
14 motivation statement.

15 **a. The claimed invention**

16 The invention is drawn to a smart card containing a tracking
17 mechanism, which tracks shopping preferences of consumers by recording
18 the type, quantity, and dates of purchase for a pre-selected group of
19 products. The smart card is useful in a system and method for introducing
20 new and alternative products that are of the same type as products normally
21 purchased by the shopper. The smart card records the shopper's purchases
22 and submits an automatic notification to the shopper when a quantity
threshold is achieved for the pre-selected products. This notification will
encourage the consumer to consider alternative products by providing the
consumer incentives, such as a pricing discount, to purchase an alternative
product.

23 Claim 1:
24
25

1 A method for using a smart card in a marketing analysis program
2 designed to introduce new products, the method comprising the steps of:

3 storing product information on the smart card when said
4 products are purchased by a consumer wherein said information
5 including type, quantity and dates of the product purchased;

6 identifying for each product a threshold for each of said type,
7 quantity and dates of products purchased;

8 determining an incentive for an alternative product based on
9 said threshold; and

10 automatically notifying said consumer when said threshold is
11 reached for a given product identified on the smart card and providing
12 the consumer with said incentive, whereby the incentive encourages the
13 consumer to consider alternative products.

14 **b. Evidence**

15 Reference A discloses smart card that tracks consumer
16 preferences by recording the type, quantity, and dates of purchase of
17 pre-selected products to determine trends in consumer purchases. The
18 smart card is periodically read by a scanner to determine its contents for
19 market analysis. In return for using the smart card and participating in
20 the marketing program, the user is provided with free product coupons
21 for products that are normally purchased by the shopper.

22 Reference B discloses a traditional consumer incentive program
23 that provides coupons for the purchase of named products based upon
24 the consumer's purchase of those same products to promote customer
25 loyalty.

26 **c. Poor statement of the rejection**

27 Claim 1 is rejected under 35 U.S.C. 103 as being unpatentable over
28 Reference A in view of Reference B. Reference A discloses the
29 conventional use of a smart card to track consumer preferences and provide
30 incentives. However, Reference A does not disclose the automatic
31 notification to consumer providing incentives. Reference B discloses
32 providing incentives to consumers to purchase the desired products. *It*
33 *would have been obvious to combine Reference A's smart card with*

1 Reference B's incentive to consumers because the combination would
2 allow Reference A's smart card to be more efficient.

3 **d. Analysis**

4 *The motivation, improve efficiency, is too general because it could*
5 *cover almost any alteration contemplated of Reference A and does not*
6 *address why this specific proposed modification would have been obvious.*

7 Additionally, there is nothing in either of references that would suggest
8 automatically notifying the consumer when reaching a threshold nor is
9 there anything in either reference that would suggest the notifying step.
10 Finally, although Reference B teaches a traditional coupon scheme to
11 promote customer loyalty, there is no suggestion, other than applicant's
12 disclosure, to employ this scheme to promote the introduction of new and
13 alternative products. **The rejection is improper.**

14 Like the improper rejection in the example above, the Office's stated
15 motivation – to provide improved switching capability – is too general because it
16 could cover almost any alteration contemplated of Beaulier and does not address
17 why this specific proposed modification would have been obvious. Accordingly,
18 for at least this addition reason, the Office has not established a *prima facie* case of
19 obviousness and this claim is allowable.

20 **Claims 2-10** depend from claim 1 and are allowable as depending from an
21 allowable base claim. These claims are also allowable for their own recited
22 features which, in combination with those recited in claim 1, are neither disclosed
23 nor suggested in the references cited and applied by the Office.

24 **Claim 11** recites a development system comprising:

- 25
- one or more processing chains; and
 - a matrix switch, coupled to the one or more processing chains, to recursively pass content received from the one or more processing chains through one or more processing objects to implement a development project, wherein the matrix switch *negotiates buffer*

1 *size and attributes between the matrix switch and adjacent objects,*
2 wherein the negotiated buffers are utilized to communicate media
3 content between the matrix switch and adjacent buffers without
4 requiring a buffer copy operation.

5 In making out the rejection of this claim, the Office states that the claim is
6 directed to a system for performing the method of claim 1 and is similarly rejected
7 under the same rationale. Applicant respectfully submits that the Office has not
8 established a *prima facie* case of obviousness for any of the following reasons.

9 First, Applicant respectfully submits that this claim recites feature that are
10 not recited in claim 1. As such, this claim has not been properly examined.
11 Without being properly examined and having the references specifically applied to
12 this claim, the Office has not established a *prima facie* case of obviousness.

13 Second, notwithstanding the Office's failure to specifically examine this
14 claim, Applicant has reviewed the references cited by the Office and respectfully
15 submits that all of the features recited in this claim are not disclosed or suggested
16 in the references used to make out the rejection of claim 1.

17 Third, to the extent that the Office continues to rely on its legally
18 inappropriate reasoning used in making out the rejection of claim 1, the Office has
19 failed to establish a *prima facie* case of obviousness.

20 Accordingly, for any or all of the reasons mentioned above, this claim is
21 allowable.
22
23
24
25

1 **Claims 12-18** depend from claim 11 and are allowable as depending from
2 an allowable base claim. These claims are also allowable for their own recited
3 features which, in combination with those recited in claim 11, are neither disclosed
4 nor suggested in the references cited and applied by the Office.

5 **Claim 19** recites a matrix switch object comprising:

- 6 • a dynamically determined number of inputs to receive content from
- 7 one or more processing chains; and
- 8 • a dynamically determined number of outputs, selectively coupling
- 9 one or more of the dynamically determined inputs to one or more of
- 10 the dynamically determined outputs, *wherein a matrix switch*
- 11 *negotiates with objects coupled to each of the dynamically*
- 12 *determined inputs and outputs for buffer size and attribute*
- 13 *requirements to facilitate communication between objects and*
- 14 *within the matrix switch using a shared buffer of agreed upon size*
- 15 *and attribute characteristics.*

16 In making out the rejection of this claim, the Office incorporates its
17 arguments in rejecting claim 1. Applicant respectfully submits that the Office has
18 not established a *prima facie* case of obviousness for any of the following reasons.

19 First, Applicant has reviewed the references cited by the Office and
20 respectfully submits that all of the features recited in this claim are not disclosed
21 or suggested in the references used to make out the rejection of claim 1.
22 Specifically, the subject matter appearing in bold italics above is completely
23 missing from the references.

24 Second, to the extent that the Office continues to rely on its legally
25 inappropriate reasoning used in making out the rejection of claim 1, the Office has
failed to establish a *prima facie* case of obviousness.

1 Accordingly, for any or all of the reasons mentioned above, this claim is
2 allowable.

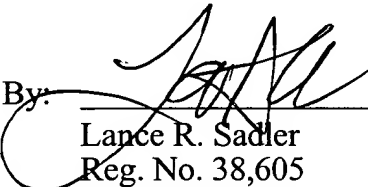
3 **Claims 20-26** depend from claim 19 and are allowable as depending from
4 an allowable base claim. These claims are also allowable for their own recited
5 features which, in combination with those recited in claim 19, are neither disclosed
6 nor suggested in the references cited and applied by the Office.

7
8 **Conclusion**

9 All of the claims are in condition for allowance. Accordingly, Applicant
10 requests a Notice of Allowability be issued forthwith. If the Office's next
11 anticipated action is to be anything other than issuance of a Notice of Allowability,
12 Applicant respectfully requests a telephone call for the purpose of scheduling an
13 interview.

14 Respectfully Submitted,

15
16 Dated: 12/21/04

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23
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